

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 DEBORAH LEE STACHEL
4 Regional Chief Counsel, Region IX
5 Social Security Administration
6 MICHAEL K. MARRIOTT, CSBN 280890
7 Special Assistant United States Attorney
8 160 Spear Street, Suite 800
9 San Francisco, California 94105
10 Telephone: (415) 977-8985
11 Facsimile: (415) 744-0134
12 E-Mail: Michael.Marriott@ssa.gov

8 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

4 DYANNE L. SCHWALM,) Case No: 2:18-cv-01587-APG-PAL
5 Plaintiff)
6 v.)
7 NANCY A. BERRYHILL, Acting) STIPULATION FOR EXTENSION OF
8 Commissioner of Social Security,) TIME TO FILE DEFENDANT'S CROSS
Defendant.) MOTION TO AFFIRM
) (Second Request)

)

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of fourteen days to Friday, May 31, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Upon review of the record and Plaintiff's MSJ, the undersigned believes that this case may warrant voluntary remand in lieu of further litigation. Defendant therefore respectfully requests this additional time to attempt to obtain remand authority.

On May 17, 2019, Plaintiff's counsel informed Defendant by email that he had no objection to this extension.

Respectfully submitted,

Date: May 17, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

By:

/s/*Cyrus Safa

CYRUS SAFA

*authorized by email May 17, 2019

Attorney for Plaintiff

Date: May 17, 2019

NICHOLAS A. TRUTANICH

United States Attorney

By:

/s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Assistant Regional Counsel

Attorneys for Defendant

Of Counsel

Jeffrey Chen

Assistant Regional Counsel

Social Security Administration

IT IS SO ORDERED.

DATE: May 21, 2019

HONORABLE BRENDA WEKSLER
HONORABLE BRENDA WEKSLER
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: May 17, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant